

May 3, 2002

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 - 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: *Ex Parte Presentation*
American Hospital Association Task Force
On Medical Telemetry
WT Docket No. 02-08

Dear Ms. Dortch:

This letter filed electronically serves as notification that on May 2, 2002, on behalf of the American Hospital Association Task Force on Medical Telemetry ("AHA Task Force"), Mary Beth Savary Taylor of the American Hospital Association, Larry Movshin and Tim Cooney of Wilkinson Barker Knauer, LLP, Scott Carter of General Electric Medical Systems Information Technologies and Bob Snyder and Jonathan Weil of Philips Medical Systems (each of which company is a member of the AHA Task Force, but which company also filed separate comments in the proceeding) participated in a series of meetings to discuss the AHA Task Force's position in the above-captioned proceeding. Separate meetings were held with Bryan Tramont, Senior Legal Advisor to Commissioner Kathleen Q. Abernathy; Paul Margie, Legal Advisor to Commissioner Michael J. Copps; Samuel Feder, Legal Advisor to Commissioner Kevin J. Martin; and with Julius Knapp, Lisa Gaisford, and Ira Keltz of the Office of Engineering and Technology. A summary of the issues addressed by the AHA Task Force is attached.

WILKINSON) BARKER) KNAUER) LLP

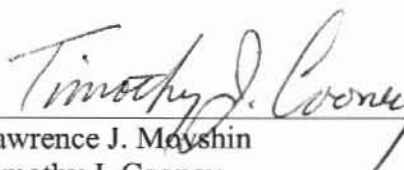
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Please contact the undersigned if you have any questions.

Very truly yours,

WILKINSON BARKER KNAUER, LLP

By:


Lawrence J. Mayshin
Timothy J. Cooney

cc: Bryan Tramont
Paul Margie
Samuel Feder
Julius Knapp
Lisa Gaisford
Ira Keltz

The American Hospital Association Task Force on Medical Telemetry (accompanied by General Electric Medical Systems Information Technologies and Philips Medical Systems)

WT Docket No. 02-8

- THE FCC HAS COMMITTED TO PROTECT WIRELESS MEDICAL TELEMETRY SERVICE ("WMTS") FROM INTERFERENCE (NPRM ¶56).
- POWER LIMITS ON, AND GEOGRAPHIC SEPARATION FROM, NEIGHBORING USERS THROUGHOUT 1.4 GHZ BAND ARE CRUCIAL TO PROTECT WMTS. LIMITS NEED TO BE MORE STRINGENT THAN AHA-ITRON PLAN IF 1427-1432 MHZ BAND IS NOT LIMITED TO UTILITY TELEMETRY.
- WMTS STRONGLY PREFERS LIMITING ELIGIBILITY ON NEIGHBORING FREQUENCIES IN 1427-1432 MHZ BAND TO UTILITY TELEMETRY BECAUSE OF EASY IDENTIFICATION AND UTILITY INTEREST IN NOT INTERFERRING.
- BECAUSE UNRESTRICTED MOBILES CREATE THE GREATEST LIKELIHOOD OF UNCORRECTABLE INTERFERENCE TO WMTS USE, MOBILES IN 1427-1432 MHZ BAND MUST BE PROHIBITED – EVEN AT THE RISK OF RESTRICTING FLEXIBLE SPECTRUM USE -- AND STRINGENT TECHNICAL LIMITATIONS MUST BE PLACED ON MOBILES IN 1392-1395 MHZ AND 1432-1435 MHZ BANDS.
- PRECISE BAND FLIP PROPOSED BY AHA-ITRON (WHERE WMTS IS PRIMARY AT 1429-1431.5 MHZ IN 7 AREAS) SHOULD BE CODIFIED TO ASSURE WMTS THE FULL USE OF THE 1427-1432 MHZ BAND ADOPTED BY THE COMMISSION. IN THE ABSENCE OF APPROPRIATE CODIFICATION THERE IS NO ENFORCEMENT MECHANISM.
- ALL POTENTIAL NEIGHBORS OF WMTS IN 1.4 GHZ BAND (1392-1395, 1427-1435 MHZ) MUST BE REQUIRED TO SHARE FREQUENCY COORDINATION DATABASE WITH WMTS DATABASE ADMINISTRATOR (ASHE).